

# M1 Junctions 28 to 35a Air Quality Mitigation Summary of Consultation Responses



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## ***Executive Summary***

The Highways Agency has developed proposals to implement smart motorways<sup>1</sup> – all lane running (which include the conversion of the hard shoulder to a permanent running lane, increasing capacity by an extra lane – see section 1.3) between junctions 28 and 31 and between junctions 32 and 35a, and to install variable mandatory speed limits between junctions 31 and 32. These schemes would support economic growth, increase motorway capacity and reduce congestion, smooth traffic flows and provide more reliable journey times.

The development of the smart motorway schemes included a detailed assessment of environmental effects, including the impact the schemes may have on local and regional air quality. These assessments indicated that, for operation with an additional lane and at the national speed limit (70mph), the extra capacity and the increased traffic flows that these schemes provide would have adverse impacts on local air quality at Air Quality Management Areas (AQMAs) and sensitive receptors. The Highways Agency consulted on proposals for managing this issue earlier this year.

The consultation provided an opportunity for representative organisations, businesses and the general public to comment on the proposals, including the suggested approach of implementing a 60mph speed limit on this section of the M1 07:00 to 19:00, seven days a week when the smart motorway schemes are complete between junctions 28 and 35a.

As a result of the consultation, the Secretary of State for Transport has rejected this as the preferred approach to mitigating local air quality impacts.

The Highways Agency is now rigorously investigating alternatives as work progresses on the M1 28-35a during the next 12-18 months, to determine if the proposed variable speed limit and daily duration is necessary, in full or over a reduced length of the smart motorway schemes, or for a reduced period of the week/day, to remove significant local air quality impacts. If any proposals continue to include varying speed limits, they must only apply when absolutely necessary. The report concludes that:

- The consultation has shown widespread opposition to the proposal and the Secretary of State has rejected this approach as the Government's preferred mitigation option.

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<sup>1</sup> *The consultation document refers to the proposed implementation of managed motorways between junctions 28 and 31 and between junctions 32 and 35a of the M1. We now refer to managed motorways as smart motorways which encompass all sections of our network that incorporate technology to manage congestion and improve journey time reliability. This includes controlling speeds through the use of variable mandatory speed limits to improve traffic flow and providing driver information on overhead signs. Smart motorways can use technology to open the hard shoulder at times of peak demand or permanently convert it to a traffic lane with additional emergency refuge areas to add extra capacity on the busiest sections of the motorway network.*

- The Highways Agency will be actively investigating alternatives to a proposed speed limit over the next 12-18 months that also satisfy the requirement to have no significant air quality impacts.
- These include consideration of alternatives that maintain the 70mph limit wherever possible, particularly when traffic tends to be lighter, such as at weekends and outside peak commuting hours
- The alternative of not providing this smart motorway scheme will not address the rising traffic levels on this section of the M1. This in turn will lead to worsening congestion with potential adverse impacts on local air quality and economic growth.
- If the beneficial impacts on economic growth, increased motorway capacity and reduced congestion that the smart motorway schemes would deliver are to be realised, some form of mitigation for the potential adverse impact on local air quality is required.

The eight week consultation period began on 6 January 2014, and closed on 3 March 2014. This paper provides a summary of the consultation responses. Over that period, 827 responses were received through an on-line survey and directly from respondents. The main question in the consultation was “Do you consider that the proposal to introduce a maximum mandatory 60mph speed limit is an acceptable measure to mitigate any adverse impacts that these schemes could have on local air quality?” Overall, 92% of those who commented on the proposal did not agree that this was an acceptable measure. Among the responses received were comments from a wide range of businesses and representative organisations. The following table summarises the responses by type of organisation (and is discussed in more detail at section 2.7).

<b>Group</b>	<b>In favour</b>	<b>Against</b>	<b>Other comments</b>	<b>Total</b>
Small to Medium Enterprise (up to 50 employees)	3	42	1	46
Large Company	1	15		16
Representative Organisation	5	12	1	18
Interest Group	3	2	1	6
Local Government	5	5		10
Central Government	1		1	2
Police		2		2
<b>Totals</b>	<b>18</b>	<b>78</b>	<b>4</b>	<b>100</b>

**Summary of responses from businesses and representative organisations**

## **1 INTRODUCTION**

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### **1.1 Purpose**

The purpose of this document is to provide a summary of the responses received during the consultation on the proposal to introduce a maximum mandatory 60mph speed limit on the M1 between junctions 28 and 35a. The consultation took place between 6 January 2014 and 3 March 2014 and provided an opportunity for stakeholders, road user groups, other interested parties and members of the public to comment. The Highways Agency has carefully considered the comments raised and this document summarises its response to those comments.

### **1.2 Background**

The M1 between junctions 28 and 35a is part of the primary strategic link between Nottingham and Leeds. Most of the link carries traffic in excess of the traffic level for which the road was designed, causing congestion and delays to road users. The Highways Agency has developed proposals to implement smart motorways – all lane running between junctions 28 and 31 and between junctions 32 and 35a, and to install variable mandatory speed limits between junctions 31 and 32.

The M1 J28 to J31 and M1 J32 to 35a smart motorway schemes were included in the review of motorway links identified in the “Advanced Motorway Signalling and Traffic Management Feasibility Study” (2008) as a potential priority for smart motorways. These schemes were included in the programme of major strategic road schemes announced in October 2010. The M1 J31 to J32 variable mandatory speed limits scheme was included in the pinch point programme, which forms part of the UK Government’s growth initiative, outlined during the Chancellor’s Autumn Statements in 2011 and 2012.

### **1.3 Smart motorways**

Smart motorways – all lanes running is a refinement of the smart motorways design already in operation in various parts of the country – not a whole new concept. Smart motorways to this design provide:

- Additional capacity by converting the hard shoulder into an additional running lane and the use of mandatory variable speed limits which are set automatically when congestion is detected.
- Earlier realisation of the benefits than would be achieved through implementing a widening scheme.
- Lower environmental impacts and costs compared to a widening scheme, as smart motorways do not require us to use additional land or to construct an additional lane – maximising the use of what we already have.

- Increased compliance by controlling and managing the motorway through the use of overhead mandatory speed limits, driver information, CCTV coverage and enforcement.
- The ability to inform drivers of unexpected conditions (such as incidents) through the latest generation of roadside variable message signs.
- Systems to detect the presence of slow moving vehicles and automatically warn approaching drivers of the potential for queues ahead.
- Automatic systems to detect slow-moving vehicles, automatically providing drivers with warnings of queues ahead.
- Operators in the regional control centres with an ability to protect any broken down vehicles by using overhead signs to warn drivers and close lanes before emergency and recovery services arrive. Full CCTV coverage will help quickly verify the locations of incidents.

Between junctions 28 and 31 and between junctions 32 and 35a the motorway would have four lanes open to traffic. The high volume of traffic using junctions 33 and 34 means that the inside lane approaching these junctions would be dedicated to traffic leaving the motorway at that junction. There would then be three lanes through middle of the junction itself, including over Tinsley Viaduct at junction 34. The slip roads bringing traffic onto the motorway at these two junctions would become a fourth lane, avoiding the need for drivers to merge into the existing traffic and meaning that there would then be four lanes again on the other side of the junction.

It is expected that the smart motorway schemes between junctions 28 and 31 and between junctions 32 and 35a would:

- Support economic growth;
- Increase motorway capacity and reduce congestion;
- Smooth traffic flows;
- Provide more reliable journey times;
- Increase and improve the quality of information for the driver.

#### **1.4 Environmental assessment**

The M1 in Derbyshire and South Yorkshire passes through or close to a number of Air Quality Management Areas (AQMAs) and other sensitive receptors. The development of the smart motorway schemes includes a detailed assessment of

environmental effects<sup>2</sup>, including any impact the schemes may have on local and regional air quality. These assessments indicate that, for operation at the national speed limit, the much needed extra capacity and the increased traffic flows that these schemes would provide will also have adverse impacts on local air quality at AQMAs and sensitive receptors.

Road traffic affects local air quality in a number of ways:

- The volume of traffic, as generally more traffic will result in poorer air quality;
- The flow of vehicles, as stop/start traffic will generate more emissions than smooth flowing traffic;
- The speed of traffic, as emissions rise at low or high speeds.

In order to ensure that there is no significant adverse impact on local air quality, it was previously proposed to implement a part time 60mph speed limit on this section of the M1 in place of the current national speed limit. This proposal has the effect of Managing the growth in traffic facilitated by the additional lane so that overall vehicle emissions would be lower than they would be without the limit.

## 1.5 Consultation topic

The proposal that we consulted on was that a speed limit of 60mph would operate 07:00 to 19:00 seven days a week on the M1 between junctions 28 and 35a when the smart motorway schemes are completed and operational. Within the section of the M1 covered by this proposal, the national speed limit would continue to apply outside the hours of operation of the 60mph speed restriction, unless variable mandatory speed limits are in operation.

The proposed speed limit would have been in place only for as long as is necessary to mitigate significant air quality impacts. The following factors would influence when that occurs:

- Newer, cleaner vehicles will come into use with the introduction of the new version of the Euro-type engines. This will be driven primarily by the requirements of the Euro VI regulations (affecting heavy goods vehicles) and Euro 6 regulations (mainly affecting cars), At the same time, older, more polluting vehicles will become obsolete and thereby be removed from the road network; and

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<sup>2</sup> *The M1 J28 to 31 Smart Motorway - Environmental Assessment Report (available at: <http://www.highways.gov.uk/publications/m1-j28-to-31-smart-motorway-environmental-assessment-report/>) and the M1 J32 to 35a Smart Motorway - Environmental Assessment Report (available at: <http://www.highways.gov.uk/publications/m1-j32-to-35a-smart-motorway-environmental-assessment-report/>).*

- Reductions in emissions from the local road network as a result of measures taken by local highway authorities in the AQMAs.

## 1.6 Consultation scope

The consultation document<sup>3</sup> stated that the scope was as follows:

“We would like to have your comments on the implementation of a maximum mandatory 60mph speed limit on the M1 between junctions 28 and 35a; specifically on how the proposal could affect your organisation or those you represent.

It is important to note that this consultation is about the implementation of a maximum mandatory 60mph speed limit on the above section of motorway in place of the national speed limit and not about the use of variable mandatory speed limits or the principle of smart motorways. Separate consultations have been held on the implementation of variable mandatory speed limits on this section of motorway.”

The geographical scope was defined as:

“The proposed maximum mandatory speed limit will apply to the M1 carriageway, including slip roads and motorway to motorway intersections, between junctions 28 (the junction with the A38) and 35a (the junction with the A616) on this major section of motorway.”

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<sup>3</sup> The M1 Junctions 28 to 35a Maximum Mandatory Speed Limit Consultation Document is available from the [www.gov.uk](https://www.gov.uk/government/consultations/m1-junctions-28-to-35a-maximum-mandatory-speed-limit) website at: <https://www.gov.uk/government/consultations/m1-junctions-28-to-35a-maximum-mandatory-speed-limit>

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## **2 SUMMARY OF RESPONSES**

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### **2.1 Publicising the consultation**

The consultation opened on 6 January 2014. As is usual practice, the consultation document was sent by post to representative organisations and placed on the [www.gov.uk](http://www.gov.uk) website where, in addition to viewing or downloading the consultation document, respondents could access an on-line response form or send an e-mail to the project team. The publication of the consultation was accompanied by publication of a news release to media. This news release was also tweeted via the Highways Agency's regional twitter channel, and Highways Agency spokespeople carried out a number of broadcast media interviews (regional and national).

In addition to sending a copy of the consultation document to representative organisations, a number of briefings were provided to key stakeholders to assist them in responding to the consultation. Briefings were provided to:

- South Yorkshire Safer Roads Partnership (a partnership made up of the four local authorities in South Yorkshire, South Yorkshire Police, South Yorkshire Fire and Rescue, South Yorkshire Passenger Transport Executive, Peak District National Park, the Health Sector and the University of Sheffield);
- Local authorities in South Yorkshire, Derbyshire and Nottinghamshire;
- Derbyshire Police (who kindly extended the invitation to members of the Derby and Derbyshire Road Safety Partnership);
- Derbyshire and Nottinghamshire Chamber of Commerce;
- Local Members of Parliament who expressed an interest in the project.

### **2.2 Types of response**

People responded to the consultation in a number of formats.

- On-line survey: the on-line survey, using Survey Monkey software, replicated the response form included in the consultation document. The software enables a rapid analysis and aggregation of the data. 97 people (19% of the total using the survey) responded using the on-line survey on the first day and 281 (54% of the total) responded in the first week, out of a total of 517 received over the eight week consultation period.
- E-mail responses: many members of the public sent an e-mail to the project team mailbox to register their views. Some of these e-mails included attachments in the form of a copy of the consultation response form. 70 e-mail responses were received on the first day (23% of the total e-mail responses) and 149 (48% of the total) in the first week, out of a total of 310 received over the eight week consultation period.

- Highways Agency Information Line (HAIL): some respondents chose to respond via this route, providing their views by e-mail or by telephone.
- Other correspondence: a small number of respondents chose to write directly to their MP, the Secretary of State or to senior Highways Agency staff.
- Freedom of Information requests: five respondents requested the disclosure of documents under the Freedom of Information route.

Of the 101 representative organisations to which the consultation document was sent, 21 have responded, using a mix of the on-line survey, the response form and detailed letters.

### 2.3 Number of responses

The tables below set out the number of responses received via the different channels.

Type of response	No. received	Notes
On-line survey	517	131 responses contained no survey data beyond limited personal data
Direct contact	310	See breakdown in Table 2 below
Total	827	

Table 1: Summary of responses by type

In the on-line survey, 135 respondents did not answer the first survey question (question 7). Analysis of this group showed that only 4 of these respondents answered any further questions at all, meaning that 131 people gave no response to the survey questions themselves. There are in effect a maximum of 386 on-line surveys in the analysis that follows and 696 responses considered overall.

Type direct contact	No. received	Notes
E-mail or letter to the project team	257	Correspondence direct to the Highways Agency e-mail address
HAIL	25	Contact via the Highways Agency Information Line
Letters to MPs or Ministers	23	Respondent contacted their MP or wrote to a Minister
Freedom of Information (Fol) requests	5	Dealt with through the Highways Agency's Fol process
Sub total	310	

Table 2: Breakdown of direct contact (e-mail or letter) by type

### 2.4 On-line survey results

Respondents accessing the [www.gov.uk](http://www.gov.uk) website were invited to use the on-line survey to provide their comments. The on-line survey followed the same structure as the response form within the consultation document.

### 2.4.1 Questions 1 to 6

Questions 1 to 6 covered confidentiality, contact information and representation. In terms of the proportion of responses from individual members of the public and responses from other organisations, the following breakdown was provided by those who answered the question:

Please select one option from the list below that best describes you, your company or organisation.		
Answer Options	Response Percent	Response Count
Small to Medium Enterprise (up to 50 employees)	9.8%	36
Large Company	4.1%	15
Representative Organisation	1.1%	4
Trade Union	0.0%	0
Interest Group	0.8%	3
Local Government	0.8%	3
Central Government	0.0%	0
Police	0.5%	2
Member of the Public	82.8%	304
Other (please describe)		15
	<i>answered question</i>	<b>367</b>
	<i>skipped question</i>	<b>150</b>

### 2.4.2 Question 7 – Acceptability of the measure

Do you consider that the proposal to introduce a maximum mandatory 60mph speed limit is an acceptable measure to mitigate any adverse impacts that these schemes could have on local air quality?		
Answer Options	Response Percent	Response Count
Yes	7.3%	28
No	92.7%	354
Please add any comments		291
	<i>answered question</i>	<b>382</b>
	<i>skipped question</i>	<b>135</b>

135 respondents did not answer this question. A review of this group showed that only 4 provided any further responses at all, meaning that 131 responses are effectively blank and do not feature in the analysis.

Those who provided comments had all answered the question first, and largely used the opportunity to re-iterate their opposition to the measure, in some cases with an explanation for why they considered the measure unacceptable.

### 2.4.3 Question 8 – Times of operation

Which of the following times of operation do you consider most acceptable?		
Answer Options	Response Percent	Response Count
7 days a week, 24 hours per day (all day, every day)	12.9%	17
7 days a week, daytime only (eg 07:00 to 19:00)	6.1%	8
7 days a week, night time only (eg 19:00 to 07:00)	2.3%	3
Monday to Friday, 24 hours per day (all day Mon-Fri)	0.0%	0
Monday to Friday, daytime only (eg 07:00 to 19:00)	6.8%	9
Monday to Friday, night time only (eg 19:00 to 07:00)	9.8%	13
Monday to Friday, peak hours only (am and pm)	62.1%	82
Other days or hours of operation (please specify)		258
	<i>answered question</i>	<b>356</b>
	<i>skipped question</i>	<b>161</b>

Of the 258 respondents who chose “other days or hours of operation”, 34 also made a selection from the options offered. 233 stated that there were no days or hours of operation they considered acceptable. Among the respondents who chose one of the other options, a peak hours restriction Monday to Friday was seen as the most acceptable approach.

### 2.4.4 Question 9 – Effect of different time durations

Do you consider that different time durations (by way of example only, two or three years as opposed to seven or eight years) might affect you or your organisation differently?		
Answer Options	Response Percent	Response Count
Yes	37.3%	124
No	62.7%	208
If yes, please give your comments:		163
	<i>answered question</i>	<b>332</b>
	<i>skipped question</i>	<b>185</b>

Those who provided comments largely used the opportunity to re-iterate their opposition to the measure. Most respondents were of the view that the length of time for which the restriction is retained made little difference.

### 2.4.5 Question 10 – Aspects of the proposal giving concerns

Are there any aspects of the proposal to introduce a maximum mandatory 60mph speed limit on the M1 between junctions 28 and 35a which give you concerns?		
Answer Options	Response Percent	Response Count
Yes	93.6%	336

No	6.4%	23
If yes, please give your comments:		322
	<i>answered question</i>	<b>359</b>
	<i>skipped question</i>	<b>158</b>

Those who provided comments largely used the opportunity to re-iterate their opposition to the measure.

#### 2.4.6 Question 11 – Additional comments

Are there any additional comments you would like to make about the proposal to introduce a maximum mandatory 60mph speed limit on the M1 between junctions 28 and 35a?		
Answer Options	Response Percent	Response Count
Yes	63.1%	219
No	36.9%	128
If yes, please give your comments:		230
	<i>answered question</i>	<b>347</b>
	<i>skipped question</i>	<b>170</b>

Those who provided comments largely used the opportunity to re-iterate their opposition to the measure. However, some respondents made additional observations (reviewed below) or, in a very few cases, offered their support for the measure.

#### 2.5 Respondents who did not use the on-line survey

A significant number of respondents did not use the on-line survey. Of the 310 people or organisations who contacted the Highways Agency directly with their comments, the responses can be summarised as follows:

Against the proposal	In favour of the proposal
284 (92%)	26 (8%)

Table 3: Summary of responses that did not use the on-line survey

The percentage of respondents opposed to the proposal is consistent with the results from the on-line survey (section 2.4.2).

#### 2.6 Key themes

The overriding theme is one of opposition to any form of a maximum speed limit below the national speed limit on a motorway. Other key themes that emerge from both the on-line survey and the public correspondence are listed below.

Note that the number of people mentioning a particular theme does not equal the total number of responses as some people made more than one comment or observation.

### 2.6.1 Environmental evidence base

Some respondents questioned the validity, reliability or even the existence of supporting environmental evidence (mentioned by 105 respondents).

#### *Highways Agency response*

Respondents requesting additional information were advised that the Environmental Assessment Report would be made available, and the final version was published on the Highways Agency web pages on 6 February 2014. A number of respondents made a formal request for sight of the Environmental Assessment Report and copies were supplied.

The analysis contained in the draft Environmental Assessment Reports led the Highways Agency to conclude that a reduction in the speed limit was necessary to ensure that there would be no significant adverse effects on local air quality from the smart motorway schemes. The Highways Agency therefore commenced the consultation as soon as this draft report was prepared, in accordance with the government's consultation principle that engagement should begin early in policy development when the policy is still under consideration and views can genuinely be taken into account.

### 2.6.2 Impact on journey time

Respondents considered that the speed limit reduction would increase journey time by an unacceptable amount (mentioned by 82 respondents). A negative economic effect was also cited. This is seen by some as a price not worth paying for air quality gains.

#### *Highways Agency response*

Analysis of current observed speeds and journey times indicates the following averages:

<b>Current Average Speed (mph, both directions)</b>			
a.m. peak	Inter peak	p.m. peak	Average
07:00 to 10:00	10:00 to 16:00	16:00 to 19:00	07:00 to 19:00
56	60	55	58
<b>Current Average Journey time (minutes, both directions)</b>			
a.m. peak	Inter peak	p.m. peak	Average

07:00 to 10:00	10:00 to 16:00	16:00 to 19:00	07:00 to 19:00
34	32	35	33

**Table 4: Average speeds and journey times**  
 Averages based on average of neutral months (April May June Sept and October 2013)  
 Excludes bank holidays and school holidays  
 Averages and not flow weighted

The business case for the smart motorway schemes includes allowance for operation at 60mph from 07:00 to 19:00 seven days a week and the schemes show a positive benefit to cost ratio, indicating that the proposal does not have a negative economic impact.

By adding an additional lane the schemes would relieve congestion at peak times;

- In the a.m. peak, average speeds are expected to rise by around 4mph, reducing journey times by around 2 minutes; and
- In the p.m. peak, average speeds are expected to rise by around 5mph, reducing journey times by around 3 minutes.

Observed average speeds during daytime inter-peak periods are 61mph so the effect of implementing a 60mph speed limit on these journeys is marginal. At weekends, recently observed average speeds are broadly consistent throughout the period (07:00 to 19:00) at 65 mph, and so it is anticipated that the 60mph speed limit would result in an increase in average journey times of 2-3 minutes. Overnight journeys are unaffected as the speed restriction only applies from 07:00 to 19:00.

### 2.6.3 Effect on traffic flow

Some people thought that the proposal would actually cause more pollution because it would create slow moving traffic, congestion, braking or standing traffic, which would “inevitably” cause more pollution (mentioned by 55 respondents).

In similar vein, some respondents considered that the proposal would actually cause more congestion as motorists slowed down to 60mph from the national speed limit (mentioned by 49 respondents).

Some respondents felt that the proposal would make the road more dangerous as they considered that drivers would compensate by speeding up outside the 60mph zone (mentioned by 31 respondents) or that a lower speed limit on a motorway was inherently more dangerous (17 respondents).

#### ***Highways Agency response***

The smart motorway schemes provide additional capacity to ease the existing congestion and provide for future growth. The modelling indicates that traffic would be moving in free flow conditions and there is no reason to suppose that a maximum

speed of 60mph, especially where the traffic is flowing freely, would lead to congestion.

Similarly, there is no reason to suppose that a 10mph reduction from the national speed limit where the traffic is flowing freely would lead to congestion. Drivers successfully manage the transition between different speed limits already, for example when slowing to enter, or accelerating on leaving, sections of motorway where variable mandatory speed limits are in operation.

#### **2.6.4 Heavy Goods Vehicles**

The relationship between emissions produced by Heavy Goods Vehicles (HGVs), limited to 56mph, and cars or light vehicles, limited to 70mph, was cited by 52 respondents, who considered that the proposal would not have the desired effect because HGVs were unaffected by the proposal. 9 responses mentioned restricting HGVs from overtaking, and a further 8 respondents specifically highlighted concerns about overtaking HGVs travelling at 56mph within area where they could not exceed 60mph. 16 respondents suggested restricting HGVs from this section of the motorway, including suggestions around transferring freight from road to rail.

##### ***Highways Agency response***

One key aspect of the proposal is that the proposed speed limit helps manage traffic growth, ensuring that any increase in traffic does not make air quality worse for local people. Restricting HGVs would have a number of very undesirable consequences. Firstly, it would affect business and the local economy. Secondly, restricting HGVs on the motorway would mean that they would, in many cases, divert onto other, less suitable routes.

The smart motorway schemes would ease congestion, allowing HGVs to travel at a relatively constant speed. When HGVs can travel without slowing down and accelerating away all the time, they operate most efficiently and produce the least emissions. If HGVs are diverted onto local roads, this would bring the emissions closer to local people, and the constant stop/start conditions on local roads would make matters worse still. Keeping the HGVs moving on the motorway creates the least pollution overall.

The Highways Agency is committed to getting the best use out of the road network and restricting heavy vehicles from overtaking is not appropriate for all sections of our network. HGVs are already restricted from using the outside lane where there are three or more lanes.

#### **2.6.5 Raising the speed limit**

Some respondents considered that raising the speed limit to 80mph would be a preferable solution, allowing traffic to transit through the area quicker (mentioned by 48 respondents).

At the same time, comparisons were drawn by some respondents with higher speed limits in force in parts of mainland Europe, and the unrestricted sections of German Autobahns were cited (mentioned by 30 respondents).

***Highways Agency response***

A speed limit over the whole distance helps manage traffic growth, ensuring that any increase does not make air quality worse for local people. It also remains the case that vehicle emissions are lower for vehicles operating below the national speed limit. Speed limits across Europe vary according to local circumstances, and this proposal is no different. Sections of the Dutch motorway network around Amsterdam, Rotterdam, The Hague and Utrecht are subject to a permanent 80km/h (50mph) speed restriction for air quality reasons, for example. As referred to in the Executive Summary, the Highways Agency is rigorously reviewing and investigating alternatives viable alternatives to implementing a 60mph, 7am-7pm, 7 days a week speed restriction.

**2.6.6 Enforcement**

Some respondents saw the proposal as a way to generate funds via speed cameras (mentioned by 46 respondents). A further 26 respondents commented on the enforceability of the proposal.

***Highways Agency response***

Speed camera enforcement is part of every smart motorway scheme, including those already in operation. Cameras are part of an overall package of technology measures aimed at smoothing traffic flow and improving journey times on smart motorways. Their function is to encourage compliance to ensure that drivers experience the full benefit of these improvements. Detailed discussions will take place with the police forces involved on the enforcement proposals.

**2.6.7 Driver information and education**

A need to ensure drivers are informed about the reasons behind the proposed speed limit in order to encourage compliance and reduce the need for enforcement was raised by some representative organisations.

***Highways Agency Response***

The Highways Agency recognises that a communications strategy will be needed should the proposal go ahead. This strategy would take account of the views expressed by key stakeholders

### **2.6.8 Impact of less polluting vehicles**

38 respondents pointed out that modern vehicles are less polluting than older vehicles, suggesting that this rendered the proposal unnecessary. Some people considered it “unfair to penalise motorists who drive less polluting vehicles” and expressed the view that the focus should instead be on targeting more polluting vehicles (also mentioned by 38 respondents). 22 respondents mentioned tax or other incentives at a national level to incentivise the uptake of less polluting vehicles.

#### ***Highways Agency response***

The Highways Agency’s analysis does take air pollution and vehicle emission trends into account. The following is taken from the consultation document:

“It is expected that vehicle emissions will reduce as more new, cleaner vehicles come into use and older, more polluting vehicles become obsolete. [...] this will be driven primarily by the requirements of the Euro VI regulations (affecting heavy goods vehicles) and Euro 6 regulations (mainly affecting cars) which come into force in 2014. The proposed maximum mandatory 60mph speed limit will be reviewed to determine whether it is still needed as air quality improves.”

The Highways Agency does not have the power to impose different speed limits on different types of vehicle beyond those already prescribed in law. There are already differential rates of Vehicle Excise Duty related to vehicle performance.

### **2.6.9 Off peak speed restriction**

A number of respondents (including representative organisations) questioned the need to reduce speed under light traffic conditions and some considered that the scheme could only be justified in peak times (mentioned by 37 respondents).

#### ***Highways Agency response***

This response has some correlation in the on-line survey where those respondents who offered a view on times of operation (question 8) showed a preference for peak hour only operation over the other alternatives.

Analysis of journey times (see Table 4 above) indicates that the proposed speed limit would only have a marginal impact on journey times in the inter-peak period. While it is the overall combination of effects that make this proposal effective, the detailed hours of operation are one area where the Highways Agency, alongside exploring alternatives, is investigating further refinements to the operational regime and these observations from respondents will help to inform that process.

### **2.6.10 European Union interference**

A number of respondents saw the proposals as being driven by the European Union (mentioned by 33 respondents).

### ***Highways Agency Responses***

Poor air quality directly affects the health of people and the environment and the limit values for pollutants set by the European Union were based on the best evidence on health consequences including guidance from the World Health Organisation. Air quality has improved significantly in recent decades and the UK currently meets the EU limits for almost all pollutants. The Government recognises, however, that there is more to be done and is playing its part, investing heavily in measures to reduce emissions, in particular from transport, and over £2 billion worth of measures have been announced since 2011.

#### **2.6.11 Good air quality is vital for people’s health and the environment which is why the Government continues to take action to improve it and reduce pollution.**

29 respondents questioned why the measure was proposed for this section of the M1 rather than other sections of motorway. A further 11 respondents did not consider that the motorway passed through heavily populated areas. Some respondents were concerned that the proposal was “only the thin end of the wedge” leading to further restrictions (mentioned by 13 respondents), while other respondents referred to the “war on the motorist” (mentioned by 8 respondents).

#### ***Highways Agency response***

The consultation document has explained that these smart motorway schemes could have significant local air quality impacts for people living and working at locations along this section of the M1. The motorway passes alongside residential areas in the Brinsworth, Tinsley and Blackburn areas of Sheffield and Rotherham in particular.

The consultation has shown widespread opposition to the proposal and the Secretary of State has rejected this approach as the Government’s preferred mitigation option. The Highways Agency is investigating alternatives that maintain the 70mph limit wherever possible, particularly when traffic tends to be lighter such at weekends and outside of commuting hours.

#### **2.6.12 Adverse effects on other roads**

The suggestion was made that the proposal would lead to congestion or would shift traffic onto other roads (mentioned by 25 respondents).

#### ***Highways Agency response***

The Environmental Assessment Report is based in part on a traffic forecast which models how traffic flows on a whole network of routes are likely to evolve over time. At a maximum speed of 60mph, this model indicates that traffic is not displaced onto other routes. However, the model also suggests that if the speed limit were lowered further there could be traffic displaced onto local roads in preference to the motorway.

### 2.6.13 Comparison with climate related issues

Comments that the proposal pales into insignificance compared to the pollution emanating from China (4 respondents) or other emerging economies, and that the environment (8 respondents) was not a reason to delay their journeys, featured in some responses.

#### *Highways Agency response*

The proposal is directly related to the local air quality for people living and working at locations along this section of the M1. The levels of pollutant chemicals of particular concern in relation to this scheme are not influenced by emissions from China or other emerging economies (as distinct from carbon/greenhouse gas emissions, which do need to be considered in a global context).

### 2.6.14 Positive themes

53 respondents were in favour of the proposal. 10 respondents considered that air quality was a legitimate reason for a speed restriction, while 11 respondents considered that this approach should be extended. 8 respondents (generally those close to the motorway) were also in favour of the measure because of the impact it would have on reducing noise levels. A 60mph limit was seen by some as safer (6 respondents), more fuel efficient (3 respondents) or better for overall journey times (3 respondents).

## 2.7 Responses from businesses and representative organisations

Responses have been received from a wide range of businesses and representative organisations. 21 responses were received from those to which the consultation document was sent directly while others have chosen to join the consultation. The following table summarises the responses by type of organisation (as used in the consultation response form and the on-line survey). Numbers replying using the on-line survey and directly to the Highways Agency are aggregated in the table below.

The numbers under “in favour” are those respondents who selected “yes” to the survey question “Do you consider that the proposal to introduce a maximum mandatory 60mph speed limit is an acceptable measure to mitigate any adverse impacts that these schemes could have on local air quality?” or indicated their support for the measure in correspondence, while those under the column “against” selected “no” to the question or indicated their opposition in correspondence. Most respondents also provided further comments; the “other comments” column records organisations that responded but did not offer a clear statement in favour or against the specific proposal.

Group	In favour	Against	Other comments	Total
Small to Medium Enterprise	3	42	1	46

(up to 50 employees)				
Large Company	1	15		16
Representative Organisation	5	12	1	18
Trade Union				0
Interest Group	3	2	1	6
Local Government	5	5		10
Central Government	1		1	2
Police		2		2
Other				0
Totals	18	78	4	100

**Table 5: Summary of responses from businesses and representative organisations**

### 2.7.1 Small and Medium Enterprises and Large Companies

Among respondents from both Small and Medium Enterprises and Large Companies are a number of employees whose response suggests that it is not a formal one on behalf of the organisation. This is based either on the supporting text or because they have requested confidentiality (13 respondents). However, all those responses have been left in the category selected by the respondent. Four companies responded directly to the Highways Agency without indicating their size; for the purpose of this analysis they have been added to the Small and Medium Enterprise category.

92% of business respondents were not in favour of the proposal, which correlates closely with views from members of the public.

### 2.7.2 Representative Organisations and Interest Groups

This category includes large membership organisations such as motoring or freight haulage organisations (8), Chambers of Commerce (3) and professional bodies (3). These organisations were consistently not in favour of the proposal, with the exception of two organisations which responded by letter without indicating support or opposition.

Five organisations represented the views of local people (four close to this section of the M1); these were all in favour.

Environmental groups (4) were generally in favour, although one was opposed, on the grounds that the measure failed to address national issues. A further interest group (details not supplied beyond stating they were a charity affected by the proposal) was also against the proposal.

Across these two categories, 33% of respondents were in favour of the proposal, reflecting the involvement of environmental and local community groups.

### 2.7.3 Central or Local Government and Police

Responses from these organisations (13) have been grouped together as there is a close working relationship between local government and local police forces in particular. Three members of the public responded under the category “Local Government” and two under the category “Police”. These are not responses on behalf of the police force or the local authority in question. They have therefore been treated as responses from members of the public and are included in the analysis above. One response in this group was received after the consultation had closed.

Unitary, county and district authorities (6), along with the police (2), responded with detailed comments on the proposal, but all except Nottinghamshire County Council were ultimately opposed to the proposal. These included:

- Sheffield City Council
- Rotherham Metropolitan Borough Council
- South Yorkshire Integrated Transport Authority in conjunction with the South Yorkshire Safer Roads Partnership (representing the four local highway authorities, four Integrated Transport Authority transport portfolio holders, South Yorkshire Police (including South Yorkshire Safety Cameras), South Yorkshire Fire and Rescue, South Yorkshire Passenger Transport Executive, Peak District National Park, the Health Sector and the University of Sheffield)
- Derbyshire County Council
- Bolsover District Council
- South Yorkshire Police and Crime Commissioner (whose response recorded an objection based on opposition to smart motorways – all lane running but did not comment on the proposal under consultation)
- Derbyshire Police

Nottinghamshire County Council considered that the proposal was an acceptable measure to mitigate any adverse impacts that the smart motorway schemes could have on local air quality, but commented that “the introduction of a maximum mandatory 60 mph speed limit should only be used when absolutely necessary to mitigate any adverse impacts on local air quality and at all other times the speed limit should remain at 70 mph”, and went on to request that the measure should only be used at specific times necessary to control air quality and at all other times the speed limit should revert to 70 mph.

Public health organisations (one national and one local) were in support of the Highways Agency taking action on air quality.

Two local parish councils close to the motorway responded in favour of the proposal, while a third response from a councillor in Cambridgeshire was also in support.

## **2.8 How the Highways Agency is responding to the consultation**

The Highways Agency is grateful to the large number of people and organisations who have taken the time to respond to this consultation. We will be responding to this consultation in several ways:

- This report provides a summary of the responses received.
- The Highways Agency will continue to work closely with the local authorities and emergency services along the route in developing smart motorway projects for the M1.

As well as sending replies to those respondents who contacted the Highways Agency directly, the full Environmental Assessment Report which underpins the proposed speed limit was placed on the website on 6 February 2014.

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### **3 CONCLUSIONS AND RECOMMENDATIONS**

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#### **3.1 Conclusions**

The analysis of the responses from members of the public to this consultation indicates that the overwhelming reaction to the proposal was negative, with 93% of respondents using the on-line survey and 92% of those who contacted the Highways Agency directly being opposed to the proposal.

Responses from representative organisations varied. Responses from organisations representing people who live close to the motorway (and in some cases other major roads) tend to support the initiative. Those from organisations representing road users were opposed to the proposal, while local authorities were not in favour for a variety of often complex reasons.

#### **3.2 Options**

Various options have been considered in relation to the M1 schemes to mitigate any significant adverse impact on local air quality. These include operational regimes such as restricting different types of vehicle or physical interventions such as barriers or tunnels. Some representative organisations in particular suggested using variable mandatory speed limits in conjunction with pollution measuring equipment to provide a dynamic response. The Highways Agency is continuing to research these options, but currently there is no dynamic mitigation responsive to real-time monitoring known or in research in the UK, Europe or Worldwide. Any alternatives would need to be viable and provide measurable benefits.

One option would be to do nothing. This scenario takes into account the predicted future traffic flow assuming that the proposed smart motorway schemes do not proceed. The net effect of not taking any action would mean:

- Congestion on this section of the M1 would continue to rise as no additional capacity will be provided to meet the predicted increased demand, resulting in journey times becoming longer and average speeds decreasing;
- The potential for continued increases in traffic flows and associated increases in pollutant emissions providing a deterioration in local air quality for people living in proximity to the motorway; Journey time reliability is likely to get worse as congestion increases;
- Negative effects on the local economy and local regeneration plans as a consequence of the congestion;

### **3.2.1 There would be no need to manage the impact the smart motorways would have on local air quality**

### **3.2.2 Smart motorways**

The alternative is to implement smart motorways. The smart motorway schemes between junctions 28 and 31 and between junctions 32 and 35a would:

- Support economic growth;
- Increase motorway capacity and reduce congestion;
- Smooth traffic flows;
- Provide more reliable journey times;
- Increase and improve the quality of driver information;

The smart motorway schemes would deliver the benefits described above whether the maximum speed limit is the national speed limit (70mph) or a variably-set limit of 60mph; the key difference would be the rate at which the predicted traffic growth occurs and the additional capacity is taken up. The Environmental Assessment Report indicates that the smart motorway schemes would also worsen local air quality for people living close to the motorway unless mitigation measures are put in place. The proposal that formed the basis of the consultation would ensure that the extra capacity and some of the increased traffic flows that the smart motorway schemes provide can be realised as early as possible without adversely affecting local air quality.

Work continues to rigorously review and investigate alternatives and this work will be informed by the response to the consultation and the Secretary of State's decision to reject, as the Government's preferred option, the proposal consulted on. Particular focus is being given to:

- When any weekend restriction could be lifted;
- Whether the restriction could be applied only during peak hours;
- When the distance over which the speed limit applies could be reduced, for example starting or ending the restriction at a different junction; and
- When the proposed restriction could be lifted completely.

This requires further modelling to be undertaken. This will:

- Use the latest National Traffic Forecasts (including any changes to HGV traffic levels);

- Take committed and reasonably certain developments into consideration;
- Use the latest version of the Transport Analysis Guidance (January 2014) published by the Department for Transport;

Take account of long term trends for vehicle emissions and recently published new Defra National Emission Forecasts.

The above are subject to regular review to ensure that they reflect current and predicted trends.

### **3.3 Recommendations**

Before arriving at a final decision the Highways Agency has very carefully considered the responses received to this consultation. This process has identified considerable opposition to the speed limit proposal. The Highways Agency has considered this carefully against both the option of doing nothing and the demonstrable benefits which will accrue should the smart motorway schemes be implemented. The Highways Agency has concluded that, in response to the large number of negative responses to the implementation of a blanket 60mph speed limit between 7.00am and 7.00pm, seven days a week on this section to mitigate air quality impacts, it will be investigating alternatives (as listed in 3.2 above) as work progresses on the M1 28-35a during the next 12-18 months. As stated in 3.2, any alternatives must provide the same degree of demonstrable and variable benefits as the imposition of the 60 mph speed limit provides in mitigating poor air quality and so avoiding significant air quality impacts. If, after this process, no alternatives can be identified which provide the same measureable benefits, any proposed mitigation that continues to include variable speed limits must only include the application of such limits when absolutely necessary.

Under such a scenario, the Highways Agency would be actively monitoring air quality levels when the schemes become operational. This would determine whether any variably applied speed limit was still required and ensure it was only ever applied as a last resort and on the most limited basis possible.

## ***Appendix A – About the Consultation Exercise***

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### **Government consultation principles**

The consultation was carried out in accordance with the Government's Consultation Principles. The consultation criteria are listed below.

**1) Subjects of Consultation** – The objectives of any consultation should be clear and will depend to a great extent on the type of issue and the stage in the policy-making process – from gathering new ideas to testing options.

**2) Timing of Consultation** – Engagement should begin early in policy development when the policy is still under consideration and views can genuinely be taken into account.

**3) Making information useful and accessible** – Policy makers should think carefully about who needs to be consulted and ensure the consultation captures the full range of stakeholders affected. Information should be disseminated and presented in a way likely to be accessible and useful to the stakeholders with a substantial interest in the subject matter.

**4) Transparency and Feedback** – The objectives of the consultation process should be clear. To avoid creating unrealistic expectations, any aspects of the proposal that have clearly been finalised and will not be subject to change should be clearly stated.

**5) Practical Considerations** - Consultation exercises should not generally be launched during local or national election periods.

Further information about the Consultation Principles can be located on the Gov.uk website:

<https://www.gov.uk/government/publications/consultation-principles-guidance>

### **Complaints about the process**

Several respondents suggested that the consultation did not accord with the principles set out above. Detailed responses were sent to those correspondents. The complaints were that:

- Insufficient information was made available to enable a detailed response to be made.

The analysis contained in the draft Environmental Assessment Reports (EAR) led the Highways Agency to conclude that a reduction in the speed limit was necessary to ensure that there would be no significant adverse effects on

local air quality from the smart motorway schemes. The Highways Agency therefore commenced a consultation on this topic as soon as this draft report was prepared, in accordance with the government's consultation principle that engagement should begin early in policy development when the policy is still under consideration and views can genuinely be taken into account. In these cases, the correspondent was directed to the final Environmental Assessment Report (EAR), which was made publicly available in full from 6 February.

- The consultation was flawed because the precise detail of the proposed measure was not yet final.

Correspondents were referred to the second of the consultation principles, explaining that the consultation had been started as soon as it was clear that the draft EAR confirmed that operation at the national speed limit would lead to a significant adverse impact on local air quality.

***Appendix B – List of consultees***


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Government / Local Government Bodies	
Chief Executive Ashfield District Council Urban Road Kirkby-in-Ashfield Nottinghamshire NG17 8DA	Chief Executive Bolsover District Council Sherwood Lodge Bolsover Derbyshire S44 6NF
Chief Executive Broxtowe Borough Council Foster Avenue Beeston Nottingham NG9 1AB	Chief Executive Chesterfield Borough Council Town Hall Rose Hill Chesterfield Derbyshire S40 1LP
Chief Executive Erewash Borough Council Town Hall Wharncliffe Road, Ilkeston Derbyshire DE7 5RP	Chief Executive Nottinghamshire County Council County Hall West Bridgford Nottingham NG2 7QP
Chief Executive Derbyshire County Council County Hall Matlock Derbyshire DE4 3AG	Chief Executive North East Derbyshire District Council The Council House Saltergate Chesterfield Derbyshire S40 1LF
Chief Executive Rotherham Metropolitan Borough Council Riverside House Main Street Rotherham S60 1AE	Chief Executive Sheffield City Council Howden House 1 Union Street Sheffield S1 2SH
Chief Executive Barnsley Metropolitan Borough Council Central Offices Kendray Street Barnsley S70 2TN	Programme Director South Yorkshire Local Transport Plan Partnership 11 Broad Street West Sheffield South Yorkshire S1 2BQ

Director General South Yorkshire Passenger Transport Executive 11 Broad Street West Sheffield S1 2BQ	President ADEPT County Hall Glenfield Leicester LE3 8ST
Chief Executive Driving Standards Agency Axis Building, 112 Upper Parliament Street Nottingham NG1 6LP	Chief Executive Local Government Association Local Government House Smith Square London SW1P 3HZ
DE&S Secretariat Ministry of Defence Maple 0a, #2043 MOD Abbey Wood Bristol. BS34 8JH	Chairman The Crown Estate 6 Bell's Brae Edinburgh EH4 3BJ
<b>Core Responders / Legal</b>	
Chairman (Traffic Committee) ACPO 7th Floor 25 Victoria St London SW1H 0EX	The Association of Ambulance Chief Executives 32 Southwark Bridge Road London SE1 9EU
Chief Constable British Transport Police Force HQ 25 Camden Road London NW1 9LN	Central Council of Magistrates Courts Committee 185 Marylebone Road, London NW1 5QB
The President Chief Fire Officers Association 9-11 Pebble Close Amington Tamworth Staffordshire B77 4RD	Chairman Derby & Derbyshire Road Safety Partnership CREST Team Derbyshire Police HQ Butterley Hall Ripley Derbyshire DE5 3RS
Chief Fire Officer Derbyshire Fire & Rescue The Old Hall Burton Road Littleover Derby DE23	Chief Constable Derbyshire Constabulary Butterley Hall Ripley Derby DE5 3RS

The Honorary Secretary District Courts Association P.O. Box 14 Civic Centre Motherwell ML1 1TW	Chief Executive East Midlands Ambulance Service 1 Horizon Place Mellors Way Nottingham Business Park Nottingham NG8 6PY
Chief Executive South Yorkshire Safer Roads Partnership 11 Broad Street West Sheffield S1 2BQ	Executive Director Magistrates' Association Fitzroy Square London W1P 6DD
Chief Constable Ministry of Defence Police 5th Floor, Zone A Main Building Whitehall London SW1A 2HB	Chief Fire Officer Nottinghamshire Fire & Rescue Service Bestwood Lodge Arnold Nottingham NG5 8PD
Chief Constable Nottinghamshire Police Force Headquarters Sherwood Lodge Arnold Nottingham NG5 8PP	Chief Executive Nottinghamshire Safety Camera Partnership Nottinghamshire Police Sherwood Lodge Nottingham NG5 8PP
The Chairman Police Federation Federation House Highbury Drive Leatherhead Surrey KT22 7UY	The President Police Superintendents Association of England and Wales 67a Reading Road Pangbourne Berkshire RG8 7JD
Regimental Secretary RHQ RMP Defence Police College Policing and Guarding Postal Point 38 Southwick Park Fareham, Hants PO17 6EJ	Chief Fire Officer South Yorkshire Fire & Rescue 197 Eyre Street Sheffield S1 3FG
South Yorkshire Police and Crime Commissioner 18 Regent Street Barnsley South Yorkshire S70 2HG	South Yorkshire Public Health Network Public Health Howden House 1 Union Street SHEFFIELD S1 2SH

Chief Executive Yorkshire Ambulance Service Springhill Brindley Way Wakefield 41 Business Park Wakefield WF2 0XQ	Operations Manager and Chair South Yorkshire Safety Camera Partnership PO Box 767 Maltby Rotherham S66 6BD
Chief Constable South Yorkshire Police Carbrook House Carbrook Road Sheffield S9 2DB	Chief Executive VOSA Berkeley House Croydon Street Bristol BS5 0DA
<b>Environmental Organisations</b>	
Chief Executive Campaign to Protect Rural England National Office 5-11 Lavington Street London SE1 0NZ	The National Trust Hardwick Hall and Stainsby Mill Doe Lea Chesterfield Derbyshire S44 5QL
Chief Executive English Heritage 1 Waterhouse Square 138-142 Holborn London EC1N 2ST	Chief Executive Natural England 1 East Parade Sheffield S1 2ET
Environment Agency Trentside Offices Scarrington Road West Bridgford Nottingham NG2 5FA	Customer and Engagement Team Environment Agency Phoenix House Global Avenue Leeds LS11 8PG
The Chair Friends of the Earth 26-28 Underwood Street London N1 7JQ	
<b>Road User / Safety Organisations</b>	

The Chairman AIRSO 68 The Boulevard Worthing BN13 1LA	The Chairman Association of British Drivers PO Box 2228 Kenley Surrey CR8 5ZT
Chief Executive BRAKE PO Box 548 Huddersfield HD1 2XZ	The Chairman British Motorcycle Federation 3 Oswin Road Brailsford Industrial Estate Braunstone Leicester LE3 1HR
Chief Executive Campaign for Better Transport 16 Waterside 44-48 Wharf Road London N1 7UX	Defensive Driver Training Limited Tudor House 2 Worcester Street Stourbridge West Midlands DY8 1AN
The Chair Disabled Persons Transport Advisory Committee 2/17 Great Minster House 33 Horseferry Road London SW1P 4DR	Chief Executive Disabled Motoring UK National Headquarters Ashwellthorpe Norwich NR16 1EX
Chief Executive Health and Safety Executive Rose Court 2 Southwark Bridge London SE1 9HS	Chief Executive Freight Transport Association Hermes House St John's Road Tunbridge Wells Kent TN4 9UZ
The Chairman Institute of Road Safety Officers Head Office 12 Haddon Close Wellingborough Northamptonshire NN8 5ZB	The Chairman Institute of Advanced Motorists IAM House 510 Chiswick High Road London W4 5RG
The Chair Motorcycle Industry Trainers Association 1 Rye Hill Office Park Birmingham Road Allesley Coventry CV5 9AB	Chief Executive Road Haulage Association Roadway House Bretton Way Bretton Peterborough PE3 8DD

The Chairman RAC Foundation 89-91 Pall Mall London SW1Y 5HS	The Chairman Motorcycle Action Group Central Office P.O. Box 750 Warwick CV34 9FU
Chief Executive National Express Group PLC National Express House Mill Lane Digbeth Birmingham B5 6DD	The Chairman PACTS Office F18 The Media Centre 7 Northumberland Street Huddersfield HD1 1RL
The Chairman Royal Society for the Protection of Accidents RoSPA House 28 Calthorpe Road Edgbaston Birmingham B15 1RP	The British School of Motoring Fanum House Basing View Basingstoke Hampshire RG21 4EA
<b>Vehicle Recovery Operators</b>	
Chief Executive Association of Vehicle Recovery Operators AVRO House 1 Bath Street Rugby CV21 3JF	Managing Director Britannia Rescue Freepost RSJA-XLCX-BLCE Folly Hall Mills St Thomas Road Huddersfield HD1 3LT
Network Operations Manger Green Flag Green Flag House Cote Lane Pudsey Leeds LS28 5GF	Chief Executive Institute of Vehicle Recovery Operators Top Floor Bignell House Horton Road West Drayton Middlesex UB7 8EJ
Operations Director Mondial Assistance Mondial House 102 George Street Croydon Surrey CR9 1AJ	The Director National Tyre Distributors Association 8 Temple Square Aylesbury Buckinghamshire HP20 2QH

Road Operations Director The Automobile Association Ltd Fanum House Basing view Basingstoke Hampshire RG21 4EA	The President Road Rescue Recovery Association Hubberts Bridge Rd Kirton Holme Boston Lincolnshire PE20 1TW
Operations Manager RAC Motoring Services RAC House Brockhurst Crescent Walsall WS5 4QZ	
<b>Business Organisations</b>	
Executive Director Derbyshire and Nottinghamshire Chamber of Commerce Commerce Centre Canal Wharf Chesterfield Derbyshire S41 7NA	Executive Director Barnsley and Rotherham Chamber of Commerce 2 Genesis Business Park Sheffield Road Templeborough Rotherham S60 1DX
Chief Executive British Insurance Brokers' Association 8th Floor John Stow House 18 Bevis Marks London EC3A 7JB	Executive Director Sheffield Chamber of Commerce Albion House Savile Street Sheffield S4 7UD
The Chairman Association of British Insurers 51 Gresham Street London EC2V 7HQ	Regional Director CBI East Midlands Adams Building The Lace Market Nottingham NG1 1NG
Regional Director CBI Yorkshire and Humber Arndale House Crossgates Leeds LS15 8EU	Chief Executive The Chartered Institution of Highways and Transportation 119 Britannia Walk London N1 7JE
Director, Civil Engineering Contractors Association (Midlands) Lasyard House Underhill Street Bridgnorth Shropshire WV16 4BB	Executive Director, Civil Engineering Contractors Association (Y & H) Unit 26 Howley Park Business Village Morley Leeds LS27 0BZ

Chief Executive Ordnance Survey Adanac Drive Southampton Hants SO16 0AS	Chief Executive English Tourist Board Visit England 1 Palace Street London SW1E 5HX
The President Institution of Civil Engineers One Great George Street Westminster London SW1P 3AA	Chief Executive Oil and Pipelines Agency York House London WC2B 6UJ
Chief Executive The Chartered Institute of Logistics and Transport Earlstrees Court Earlstrees Road Corby, Northants NN17 4AX	General Secretary Trade Union Congress Congress House Great Russell Street London WC1B 3LS
Centre Director Meadowhall Shopping Centre Ltd Management Suite 1 The Oasis Meadowhall Centre Sheffield S9 1EP	Chief Executive Sheffield International Venues SIV Enterprises Limited Don Valley Stadium Worksop Road Sheffield S9 3TL
Chief Executive Robin Hood Airport Doncaster Sheffield Heyford House First Avenue Doncaster DN9 3RH	Centre Manager, East Midlands Designer Outlet Management Suite Mansfield Road South Normanton Derbyshire DE55 2JW
Chief Executive East Midlands Airport Castle Donington Derby DE74 2SA	